Exhibit O

to

Memorandum in Support of Defendant's Post-Trial Motion for Judgment of Acquittal or in the Alternative for a New Trial

Milione, Shawn (USANYS) [Contractor]

From: Jepal, Vinay

Sent: Thursday, June 16, 2011 2:19 PM **To:** Hofmann, Stefan (Dresdner Bank)

Cc: Cole, Ashley T.; Keswani (Teckchandani), Deepa

Subject: Manual User entries in Prime.pdf - Adobe Acrobat Professional

Attachments: Manual User entries in Prime

As requested.

Party Id	Full Name	List Type	Program	Remarks	Create Date	Party Type
10001445		USER	BSA- KYCC	Another variation of Based on an email from Group Compliance FFT dated May 31, 2011, please return all transactions involving with following text "Due to internal compliance risk decisions, Commerzbank is unable to process this transaction." Upon returning please advise Sam Ibrahim of TSU of Compliance	6/16/2011 12:17:09 PM	Other
10001444		USER	BSA- KYCC	Based on an email from Group Compliance FFT dated May 31, 2011, please return all transactions involving with following text "Due to internal compliance risk decisions, Commerzbank is unable to process this transaction." Upon returning please advise Sam Ibrahim of TSU of Compliance	5/31/2011 7:36:41 PM	Other
10001443		USER	SYRIA	For Syria monitoring only, waive item if there are no SDNs, Syrian government involvement, or indications of possible terrorist finance. Otherwise refer to GM-CO Sanctions.	5/25/2011 6:14:29 PM	Other
10001442	STRATUS INTERNATIONAL CONTRACTING	USER	IRAN	Iranian construction company with extensive overseas operations. HQ in Tehran, subsidiary in Turkey possibly just for handling of USD. Email exchange between Donna Carbonaro TSU and Vinay Jepal on 5/12/11 refers.	5/19/2011 5:51:16 PM	Other
10001441		USER	311	Notice of proposed ruling published 8/24/04, Federal Register V. 69 #163. Fifth Special Measure (prohibition of correspondent accounts) proposed but no update so far. The bank changed its name to and SWIFT code to as announced in FinCEN advisory FIN-2006-G002 4/10/06. Until further notice this entry is intended for monitoring only.	5/11/2011 6:13:08 PM	Other
10001440		USER	IRAN	See case 462607. German company but attempted to pay \$22,861.00 to, an Iranian company. Refer to CBNA Sanctions, any payments should be reviewed until 5/30/11 to avoid resubmissions. Payments without Iranian nexus (or other issues, of course) are OK.	3/31/2011 3:08:55 PM	Other
10001439		USER	IRAN	Account of with is an Iranian company.	3/31/2011 3:04:58 PM	Other
10001438		USER	IRAN	Tehran-based airfield services and forwarding company. Has an account No. 0024108591100 with and has been shown deceptively with address in Sharjah. Rejectable.	3/31/2011 3:03:29 PM	Other
10001437		USER	LIBYA2	See party id , (LIBYA2). Deleted acronym SOC as alternate name because of false positives on abbreviations for "Society", "Societé". Creating separate compensatory sanctioned party names for SOC in conjunction with geography: Marsa al Brega, Tripoli, Libya.	3/23/2011 11:09:58 AM	Other
10001436		USER	LIBYA2	See party id , (LIBYA2). Deleted acronym SOC as alternate name because of false positives on abbreviations for "Society", "Societé". Creating separate compensatory sanctioned party names for SOC in conjunction with geography: Marsa al Brega, Tripoli, Libya.	3/23/2011 11:09:33 AM	Other
10001435		USER	LIBYA2	See party id (LIBYA2). Deleted acronym SOC as alternate name because of false positives on abbreviations for "Society", "Societé". Creating separate compensatory sanctioned party names for SOC in conjunction with geography: Marsa al Brega, Tripoli, Libya.	3/23/2011 11:08:58 AM	Other
10001434	Cartago, Colombia	USER	SDNT	See party "Continuous hits on single word S.A. because incorporation term S.A. is a noise word. Deleting that party record and creating more specific name/address combinations to catch the SDN name without so many false positives.	3/18/2011 3:41:00 PM	Other
		1	Ī	l		24-1

Sanctioned	Parties where L	ist Type e	qual to 'U	JSER' and List Status not equal to 'Deleted'		Page 2 of 3
1	Case 1	:18-cr-00	224-AJN 1	Document 336-15 Filed 05/01/20 Page 4 See party No. Continuous hits on	of 5	1
10001433		USER	SDNT	single word S.A. because incorporation term S.A. is a noise word. Deleting that party record and creating more specific name/address combinations to catch the SDN name without so many false positives.	3/18/2011 2:58:45 PM	Other
10001432		USER	LIBYA2	Refer to record Full name designated by US Treasury on 3/15/11. The simple name hits any and created 127 false positive cases from 20:45 3/15/11 to 13:15 3/18/11. Deleted original SDN record and created new, more specific entries; preferable to excluding names of the various foreign All names created as parties since alternate names for user SPNs appear ineffective at present.	3/18/2011 1:27:28 PM	Other
10001431		USER	LIBYA2	Refer to record 603321. Full name designated by US Treasury on 3/15/11. The simple name hits any and created 127 false positive cases from 20:45 3/15/11 to 13:15 3/18/11. Deleted original SDN record and created new, more specific entries; preferable to excluding names of the various foreign All names created as parties since alternate names for user SPNs appear ineffective at present.	3/18/2011 1:26:57 PM	Other
10001430		USER	LIBYA2	Refer to record 603321. Full name , designated by US Treasury on 3/15/11. The simple name hits any and created 127 false positive cases from 20:45 3/15/11 to 13:15 3/18/11. Deleted original SDN record and created new, more specific entries; preferable to excluding names of the various foreign . All names created as parties since alternate names for user SPNs appear ineffective at present.	3/18/2011 1:26:30 PM	Other
10001429		USER	LIBYA2	Refer to record 603321. Full name designated by US Treasury on 3/15/11. The simple name hits any and created 127 false positive cases from 20:45 3/15/11 to 13:15 3/18/11. Deleted original SDN record and created new, more specific entries; preferable to excluding names of the various foreign All names created as parties since alternate names for user SPNs appear ineffective at present.	3/18/2011 1:26:09 PM	Other
10001428		USER	LIBYA2	Refer to record	3/18/2011 1:25:30 PM	Other
10001427		USER	LIBYA2	Refer to record 603321. Full name designated by US Treasury on 3/15/11. The simple name hits any and created 127 false positive cases from 20:45 3/15/11 to 13:15 3/18/11. Deleted original SDN record and created new, more specific entries; preferable to excluding names of the various foreign appraisance. All names created as parties since alternate names for user SPNs appear ineffective at present.	3/18/2011 1:24:48 PM	Other
10001426		USER	BSA- KYCC	Cancel/return any payments involving this company with the narrative: "Due to internal compliance risk decisions, Commerzbank is unable to process this transaction." Decision of Global Surveillance Committee 2/17/2011 emails from Tanja Kaul 2/17 and Dieter Gohl 2/18/2011 refer. Effective date 2/21/2011. On 2/25/11 emails from Tanja Kaul and Deepa Keswani temporarily rescinded the decision with 3/11/11 as target date for reimplementation. Final decision 3/11/11. all transactions for to be rejected as of 3/14/11 citing the above reason.	3/17/2011 9:56:08 AM	Other
			BSA-	As per email from Thomas Weyer dated 3/16/11, Cancel/Return any payment with this party quoting "Due to corporate business policy we regret to inform you that	3/16/2011	24-1

Sanctioned	Parties where Li	ist Type e	qual to 'U	SER' and List Status not equal to 'Deleted' Document 336-15 Filed 05/01/20 Page 5	of E	Page 3 of 3
10001425		USER	KYCC	Commerzbank is not in position to complete this transaction on your behalf" For any questions or upon cancel/return, advice GM-CO via email box "GM-CO_GwG_Verdachtsmeldungen"	5: 40: 02 PM	Other
10001424		USER	BSA- KYCC	As per email from Thomas Weyer dated 3/16/11, Cancel/Return any payment with this party quoting "Due to corporate business policy we regret to inform you that Commerzbank is not in position to complete this transaction on your behalf" For any questions or upon cancel/return, advice GM-CO via email box "GM-CO_GwG_Verdachtsmeldungen"	3/16/2011 5:39:35 PM	Other
10001423		USER	BSA- KYCC	As per email from Thomas Weyer dated 3/16/11, Cancel/Return any payment with this party quoting "Due to corporate business policy we regret to inform you that Commerzbank is not in position to complete this transaction on your behalf" For any questions or upon cancel/return, advice GM-CO via email box "GM-CO_GwG_Verdachtsmeldungen"	3/16/2011 5:39:04 PM	Other
10001422		USER	BSA- KYCC	As per email from Thomas Weyer dated 3/16/11, Cancel/Return any payment with this party quoting "Due to corporate business policy we regret to inform you that Commerzbank is not in position to complete this transaction on your behalf" For any questions or upon cancel/return, advice GM-CO via email box "GM-CO_GwG_Verdachtsmeldungen"	3/16/2011 5:38:27 PM	Other
10001421		USER	BSA- KYCC	As per email from Thomas Weyer dated 3/16/11, Cancel/Return any payment with this party quoting "Due to corporate business policy we regret to inform you that Commerzbank is not in position to complete this transaction on your behalf" For any questions or upon cancel/return, advice GM-CO via email box "GM-CO_GwG_Verdachtsmeldungen"	3/16/2011 5:37:40 PM	Other